

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

David J. Catanzaro,

Plaintiff,

v.

Lykart Technologies LLC, et al.,

Defendant.

Case No.: 3:22-CV-01754-JFS-PJC

Judge Joseph F. Saporito

Judge Phillip J. Caraballo

JURY TRIAL DEMANDED

**UNOPPOSED MOTION OF APPLE INC. TO EXTEND
TIME TO RESPOND TO PLAINTIFF'S
VERIFIED FIFTH AMENDED COMPLAINT**

Defendant Apple Inc. ("Apple") moves for an extension of time to respond to Plaintiff's Verified Fifth Amended Complaint (ECF No. 71), and in support thereof, states as follows:

1. Apple was served the Third Amended Complaint on February 28, 2025. Subsequently, Plaintiff filed the Fifth Amended Complaint ("Operative Complaint") on March 17, 2025 (ECF No. 71).
2. Apple's response to the Operative Complaint is currently due on or before April 7, 2025.
3. Apple desires additional time to prepare and file a responsive pleading or motion.

4. This is Apple's first motion to extend time to respond.
5. Apple has met and conferred with Plaintiff ("the Parties").
6. The Parties have agreed that Apple's time to respond to the Operative Complaint shall be May 1, 2025.

Defendant Apple Inc. respectfully requests an extension to respond to the Operative Complaint by May 1, 2025.

Respectfully submitted,

Dated: March 18, 2025

By: /s/ Stephen H. Barrett
Stephen H. Barrett
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*Attorney for Defendant Apple
Inc.*

CERTIFICATE OF CONCURRENCE

The undersigned certifies that counsel for Defendant Apple Inc. contacted Plaintiff regarding Plaintiff's concurrence with the foregoing motion. Plaintiff concurs in the requested relief.

Dated: March 18, 2025

By: /s/ Stephen H. Barrett
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*Attorney for Defendant Apple
Inc.*

CERTIFICATE OF SERVICE

I certify that on this 18th day of March, 2025, I served a copy of the foregoing Unopposed Motion of Defendant Apple Inc. to Extend Time to Respond to Plaintiff's Verified Fifth Amended Complaint upon all counsel and parties of record via this Court's electronic filing system, which service satisfies the requirements of the Federal Rules of Civil Procedure.

Dated: March 18, 2025

By: /s/ Stephen H. Barrett
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*Attorney for Defendant Apple
Inc.*